

discovery material be disclosed, in any other manner, to any individual or entity, including members of the news media, except as provided in this Order, as has been agreed by the parties, or as further ordered by the Court.

2. The discovery material provided contains information provided by confidential human sources. No information provided by, or related to the identity of, these confidential human sources may be disclosed in any manner by the defendant, her attorneys, or any of the individuals or entities to which discovery is provided.

3. The defendant shall use discovery material and its contents solely for the preparation, trial, direct appeal (if any), and collateral attack (if any) of this case and for no other purpose whatsoever. No additional copies of any discovery material shall be made except as necessary for those purposes. Before first disclosing discovery material or its contents to any of the individuals or entities listed above, the defendants or their attorneys of record must give to the individual or entity a copy of this Order and maintain a copy signed and dated by the individual or a representative of the entity until such time as all appeals in this matter (if any) are concluded.

4. The parties shall comply with Federal Rule of Criminal Procedure 49.1 with respect to the public filing or use of any discovery material containing personally identifiable or sensitive information, including: (1) Social Security numbers, (2) names of minor children, (3) dates of birth, and (4) financial account numbers. *See* Fed. R. Crim. P. 49.1. The parties shall also apply the requirements of Rule 49.1 when showing any discovery material containing personally identifiable or sensitive information to any third-party.

5. Should the defendant, her attorneys of record, or any of the other individuals or entities listed above find any material inadvertently produced by the United States that is marked as classified, they shall immediately double-seal the material and all copies of the material, inform

the United States of such inadvertent disclosure, and make arrangements for the secure return of such material to the United States.

6. At the request of the government, the defendant shall return all copies of material that was inadvertently produced in discovery.

7. Within 60 days following the conclusion of these proceedings, or any direct appeal (if any) from or collateral attack (if any) upon these proceedings, the discovery material disclosed by the United States and any duplicates made for the preparation, trial, direct appeal (if any), or collateral attack (if any) of this case shall be returned to the United States or destroyed by the defendant, unless the Court (or Government) gives specific written permission for an exception to this requirement.

8. This Order also applies to any and all individuals to whom the defendant, pursuant to this Order, show or disclose the contents or substance of any material produced to them by the United States. By signing and dating a copy of this Order, any person or entity that receives copies of any material produced, or to whom the contents of such material is otherwise disclosed, submits himself, herself, or itself to the jurisdiction of this Court for all purposes, including sanctions or contempt for violation of this Order.

IT IS SO ORDERED.

Jennifer A. Dorsey
United States District Judge

Dated: _____